UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Albert Russo

CN 4853

Trenton, NJ 08650

(609) 587-6888

Standing Chapter 13 Trustee

In re:

Tracey L. Gladden

Debtor(s)

Case No.: 20-15557 / MBK

Chapter 13

Hearing Date: 9/9/2020 at 9:00 AM

Judge: Michael B. Kaplan

## TRUSTEE'S OBJECTION TO MOTION TO VACATE DISMISSAL

Albert Russo, the Standing Chapter 13 Trustee, hereby objects to the Motion to for the

following reasons:

- 1. The debtor has not supplied the Trustee with the following item(s):
  - valuation of real property
  - amended schedules
  - Deed.
  - Homeowners insurance with liability coverage.
- 2. The debtor has failed to file a feasible plan that addresses tax claims.

Dated: August 11, 2020 /s/ Albert Russo

Albert Russo, Standing Chapter 13 Trustee

By: David Martin, Staff Attorney